

NEW YORK STATE DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

(Complaint)

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David Rennie

Plaintiff,

v.

) Index No.:

) Case No.:

23 CV 4013

Top View / Go New York Tours / Intellectual Property Infringement

South East Personnel

(S)

Defendant.

PRELIMINARY STATEMENT

Defendant allegedly duplicated and distributed safety manual draft without written or verbal consent, used to educate trainee's / new hires at Top View / Go New York Tours. Plaintiff would have licensed content (Safety Manual Draft) to Top View / Go New York Tours, however unable to register, written content due to financial constraints upon Wrongful Termination. Plaintiff was granted a Remand Request Case 1:23-cv-02311-LJL on 4/14/2023 from Southern District Court of New York, due to the fact that plaintiff made no claims of Patents, Trademarks nor Copyrights. Plaintiff simply stated that a physical draft of his intellectual property was not returned by defendant after two request. (See Case No. 101031-2022 / Count 3. Theft by Deception)

ARGUMENT

Defendant has upped-the-ante by Duplicating and Distributing PDF draft without written consent from Plaintiff / Author David Rennie. Plaintiff at no time when actively employed with Top View / Go New York Tours and training any of Top View's new hires gave a physical copy nor PDF copy via email of Safety Manual Draft. This shows the discipline of and professionalism of Plaintiff the owner of a Digital Media Production Company Studio 4x4 (studio4x4.com).

Plaintiff admits to have requested review from senior drivers that trained him, keeping in mind Plaintiff was training on his second week of employment, based on his previous experience as a driver / trainer. Plaintiff believes an assailant of Defendant, was a part of his wrongful termination in order to play Robin Hood, with PDF emailed copy of Safety Manuscript, while Plaintiff faced wrongful termination, a state of anguish,

delayed arbitration proceedings and the struggles of seeking re-employment or new employment. Plaintiff at no time gave written consent nor verbal consent to distribute PDF Manuscript draft. Plaintiff was training Top Views / Go New York Tours new hire's on his second week to the last month of employment however new promoted to trainer with a higher pay grade (See Case No. 101031-2022 Count 2. Discrimination), Plaintiff never asked for compensation for Safety Manual Draft, seeing that it is only a draft.

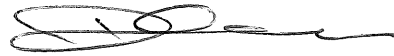
CONCLUSION

Plaintiff again cannot live with himself knowing corporate executives that make upwards of \$100,000 per year stole his Physical Draft (See Case No. 101031-2022) and then decided to duplicate and distribute virtual draft of Plaintiff's intellectual property, without permission, knowing they orchestrated the act of Wrongful Termination, Discrimination (See Case No. 101031-2022 / Count 1. Wrongful Termination, Count 2. Discrimination) and left plaintiff in a state of anguish now Transitionally Housed in Bronx, NY. Plaintiff is not seeking indictment nor pursuant of criminal charges, just simply seeking compensation in the amount of \$30,000,000.

Certification Under Penalty of Perjury

I certify under penalty of perjury pursuant to the laws of the State of New York that the foregoing is true and correct.

Answered this 12th day of May , 2023



David Rennie

781 E 135 St
Bronx, NY 10454
(Willow Meadows)